



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

April 11, 2022

**BY ECF**

Honorable Ronnie Abrams  
United States District Judge  
Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, New York 10007

**Re: *United States v. Niloufar Bahadorifar et al.*,  
S1 21 Cr. 430 (RA)**

Dear Judge Abrams:

The Government respectfully submits this status letter with respect to the conference scheduled for April 12, 2022. The Government has conferred with counsel for the defendant, and the parties propose to adjourn the conference for approximately 30 days. The reasons for the proposed adjournment are: (i) to permit the Government additional time to review certain electronic items seized from the defendant's residence pursuant to search warrants, and to provide the defense with data identified as responsive to the warrants; (ii) to permit the defendant additional time to review discovery in this matter; and (iii) for the Government and defense counsel to discuss a potential disposition of this matter.

Should the request be granted, the Government requests that time be excluded under the Speedy Trial Act until the date of the adjourned conference. Defense counsel consents to this request. The ends of justice served by the requested exclusion outweigh the best interests of the public and the defendant in a speedy trial because it will permit the defendant and her counsel time to review discovery, to consider potential pretrial motions, and to consider a potential disposition of the matter. *See* 18 U.S.C. § 3161(h)(7).

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

By:                     /s/                      
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cc: Counsel of record (by ECF)